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**From:** Nesci, Kimberly [Nesci.Kimberly@epa.gov]  
**Sent:** 3/9/2021 1:37:45 PM  
**To:** Messina, Edward [Messina.Edward@epa.gov]  
**CC:** Anderson, Neil [Anderson.Neil@epa.gov]; Goodis, Michael [Goodis.Michael@epa.gov]; Katims, Casey [Katims.Casey@epa.gov]  
**Subject:** FW: Follow up to my question on PFAS Containers and "non-detect"

See below for information on response to Jason Brune's question. I've boiled it down to the text in blue below (though I wanted to keep Thuy's and Yaorong's information in the thread for you for reference). Let me know if you'd like me to respond to Jason, or if you'd like to use this text (or if Casey should reply?):

## Ex. 5 Deliberative Process (DP)

Thanks,  
Kimberly

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**From:** Nguyen, Thuy <Nguyen.Thuy@epa.gov>  
**Sent:** Monday, March 8, 2021 8:57 AM  
**To:** Qian, Yaorong <qian.yaorong@epa.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>  
**Cc:** Anderson, Neil <Anderson.Neil@epa.gov>  
**Subject:** RE: Follow up to my question on PFAS Containers and "non-detect"

As stated in the memo, the study was only designed to determine the source of PFAS in the contaminated product

Yes, there are PFAS found in the non-fluorinated containers, however at levels much lower than the fluorinated containers (50 x lower ). The only use of those levels is to compare what's in a fluorinated container versus a non-fluorinated container of the same size.

## Ex. 5 Deliberative Process (DP)

Thuy

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**From:** Qian, Yaorong <[qian.yaorong@epa.gov](mailto:qian.yaorong@epa.gov)>  
**Sent:** Monday, March 8, 2021 8:18 AM  
**To:** Nesci, Kimberly <[Nesci.Kimberly@epa.gov](mailto:Nesci.Kimberly@epa.gov)>; Nguyen, Thuy <[Nguyen.Thuy@epa.gov](mailto:Nguyen.Thuy@epa.gov)>  
**Cc:** Anderson, Neil <[Anderson.Neil@epa.gov](mailto:Anderson.Neil@epa.gov)>  
**Subject:** RE: Follow up to my question on PFAS Containers and "non-detect"

A very good question from Jason Brune.

How about the following response:

## Ex. 5 Deliberative Process (DP)

Thanks,

Yaorong

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**From:** Nesci, Kimberly <[Nesci.Kimberly@epa.gov](mailto:Nesci.Kimberly@epa.gov)>  
**Sent:** Saturday, March 06, 2021 4:52 PM  
**To:** Nguyen, Thuy <[Nguyen.Thuy@epa.gov](mailto:Nguyen.Thuy@epa.gov)>; Qian, Yaorong <[qian.yaorong@epa.gov](mailto:qian.yaorong@epa.gov)>  
**Cc:** Anderson, Neil <[Anderson.Neil@epa.gov](mailto:Anderson.Neil@epa.gov)>  
**Subject:** FW: Follow up to my question on PFAS Containers and "non-detect"

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**From:** Messina, Edward <[Messina.Edward@epa.gov](mailto:Messina.Edward@epa.gov)>  
**Sent:** Friday, March 5, 2021 5:08 PM  
**To:** Katims, Casey <[Katims.Casey@epa.gov](mailto:Katims.Casey@epa.gov)>; Brune, Jason W (DEC) <[jason.brune@alaska.gov](mailto:jason.brune@alaska.gov)>  
**Cc:** Subramanian, Hema <[Subramanian.Hema@epa.gov](mailto:Subramanian.Hema@epa.gov)>; Nesci, Kimberly <[Nesci.Kimberly@epa.gov](mailto:Nesci.Kimberly@epa.gov)>  
**Subject:** RE: Follow up to my question on PFAS Containers and "non-detect"

We will get you a fuller answer from our scientists, but in short these were amounts “at the level of detection of the equipment.” PFAS chemicals are ubiquitous so knowing if this was background or not is difficult to discern. The

equipment itself might contain these substances, although every effort was made to remove possible sources of contamination such as tubing. Great question. Hope this provides an initial answer. Will follow up with an additional response next week.

Ed

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Office of Pesticide Programs  
Office of Chemical Safety & Pollution Prevention  
U.S. Environmental Protection Agency  
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**From:** Katims, Casey <[Katims.Casey@epa.gov](mailto:Katims.Casey@epa.gov)>  
**Sent:** Friday, March 5, 2021 12:31 PM  
**To:** Brune, Jason W (DEC) <[jason.brune@alaska.gov](mailto:jason.brune@alaska.gov)>  
**Cc:** Subramanian, Hema <[Subramanian.Hema@epa.gov](mailto:Subramanian.Hema@epa.gov)>; Messina, Edward <[Messina.Edward@epa.gov](mailto:Messina.Edward@epa.gov)>  
**Subject:** RE: Follow up to my question on PFAS Containers and "non-detect"

Commissioner Brune:

I apologize for truncating! Adding Ed and Hema here, who can help run down an answer to this question.

Thanks for joining us today and sorry again for the miscommunication.

All the best,

Casey

**Casey Katims**  
Deputy Associate Administrator for Intergovernmental Relations  
U.S. Environmental Protection Agency  
(202) 494-4609  
Pronouns: he/him/his

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**From:** Brune, Jason W (DEC) <[jason.brune@alaska.gov](mailto:jason.brune@alaska.gov)>  
**Sent:** Friday, March 5, 2021 12:08 PM  
**To:** Katims, Casey <[Katims.Casey@epa.gov](mailto:Katims.Casey@epa.gov)>  
**Subject:** Follow up to my question on PFAS Containers and "non-detect"

Casey,

I asked the following question during the meeting, which you truncated:

"These are in PPB, not PPT, so I wouldn't necessarily say the non-fluorinated containers are non-detect, at least at levels that we're used to measuring. In short, is it thought that there might be PFAS used in the production of these jugs prior to fluorination?"

EPA's LHA is 70 ppt, and based on my look at the attached graph which was shown during the presentation, it appears these #s are actually not non-detect (at least the interior) which come in at what appears to be 1 ppb, levels that might

reach EPA's LHA of .7 ppb, or at a minimum reach the levels some states have set as their minimum threshold. Please explain how this is non-detect given we are expected to measure at parts per trillion. I recognize the LHA levels are for drinking water, not HDPE plastic containers, but it will still cause some confusion. Thank you.

Jason Brune, Commissioner  
Alaska Department of Environmental Conservation